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8 **UNITED STATES DISTRICT COURT**
9 **EASTERN DISTRICT OF WASHINGTON**

10 DAVID JANIASHVILI,

11 No.

12 Plaintiff,

13 v.
14 COMPLAINT FOR DAMAGES
15 AND JURY DEMAND

16 MACK TRUCK LINES, INC. a
17 California corporation; JASPREET
18 SINGH; ARTUDIANTI, INC.; and
19 DACHI GOGOLADZE,

20 Defendants.

21 Plaintiff, by and through his attorneys, John Gorey, Gorey Law Group, P.C.,
22 Richard C. Feltman and Feltman Ewing, P.S., hereby alleges as follows:

23 **I. PARTIES**

24 1. The Plaintiff is a citizen of The Borough of Brooklyn, State of New
25 York.

2. Mack Truck Lines, Inc. is a California corporation with its principal place of business in California.

3. At all times relevant hereto, Jaspreet Singh is believed to be a citizen of the State of California.

4. Artudianti, Inc. is an Illinois corporation with its principal place of business in the State of Illinois.

5. At all times relevant hereto, Dachi Gogoladze is believed to be a citizen of the State of Illinois.

II. JURISDICTION

6. This Court is vested with jurisdiction pursuant to 28 U. S. Code § 1332(a)(1) of the United States Code, in that the controversy exceeds the sum of \$75,000.00 and there is diversity of citizenship among the parties to this action.

7. Venue is proper in the United States District Court for Eastern Washington pursuant to 28 U.S. Code §1391(a)(2).

8. Plaintiff has fulfilled all jurisdictional prerequisites and conditions prior to filing their Complaint

III. FACTUAL ALLEGATIONS

9. On or about December 12, 2018, Plaintiff was a passenger in the sleeper berth of a tractor-trailer which was owned by Defendant, Artudianti, Inc., and being operated by Defendant, Dachi Gogoladze, in the scope of his employment, in a westerly direction on I-90 approaching Milepost 246.90 in the County of Lincoln, State of Washington.

10. At said time and place, Defendant, Mack Truck Lines, Inc., was the owner of a tractor-trailer which was being operated by Defendant, Jaspreet Singh, in the scope of his employment, in a westerly direction on I-90 at Milepost 246.90, in front of Defendant, Artudianti's vehicle.

11. At said time and place, Defendant, Jaspreet Singh, caused the tractor-trailer that he was operating to jackknife, causing both of the westbound lanes of I-90 to be completely blocked.

12. As a result of the position of Defendant, Jaspreet Singh's, tractor and trailer after it jackknifed, the taillights and brake lights were not visible to traffic traveling in a westerly direction toward the location of the jackknifed tractor-trailer.

13. At said time and place, Defendants, and each of them, negligently drove, or allowed said vehicles to be negligently driven, so that as a direct and proximate result thereof, Defendants vehicles collided, thereby greatly injuring and damaging the Plaintiff.

14. Defendants, and each of them, had a duty to exercise ordinary care toward the Plaintiff.

15. In breach of said duty, Defendants, Mack Truck Lines, Inc. and Jaspreet Singh, were careless, negligent and reckless in the following respects:

- a. Negligently operated the tractor-trailer at a speed that was too fast for conditions;
- b. Negligently failed to maintain the tractor-trailer within its proper lane of traffic;
- c. Negligently failed to maintain control of the tractor-trailer;
- d. Negligently caused the tractor-trailer to jackknife;
- e. Negligently blocked both lanes of westbound travel;
- f. Negligently created an unreasonably dangerous condition on the roadway; and
- g. Were otherwise careless, reckless and negligent.

1 15. In breach of said duty, the Defendants, Artudianti, Inc. and Dachi
2 Gogoladze, were careless, reckless and negligent in the following respects:

3 a. Followed the Plaintiff's vehicle too closely in violation of
4 RCW 46.61.145;

5 b. Failed to decrease the speed of said vehicle so as to avoid
6 colliding with Jaspreet Singh's vehicle;

7 c. Failed to stop said vehicle in time to avoid said collision,
8 although he saw or should have seen, that it was impending and
9 had ample time and opportunity to avoid it;

10 d. Failed to see, hear and observe Jaspreet Singh's vehicle when it
11 could have and should have been seen, heard and observed;

12 e. Failed to keep said vehicle under proper control;

13 f. Operated said vehicle in a negligent manner in violation of
14 RCW 46.61.525;

15 g. Permitted the operation of said vehicle in a manner contrary to
16 the law in violation of RCW 46.61.765; and

17 h. Were otherwise careless, reckless and negligent.

16. By reason of, and as a direct and proximate result of the aforesaid joint and several negligence of Defendants, Plaintiff then and there sustained severe and permanent injuries and damages.

V. PRAYER

WHEREFORE, Plaintiff prays for judgment, jointly and severally, against the Defendants, and each of them, , as follows:

1. For past and future pain, suffering and damages in an amount to be proven at trial;
2. For past and future permanent partial disability;
3. For permanent partial impairment of earnings and/or earning capacity;
4. For past and future costs of medical and related expenses;
5. For past and future loss of earnings;
6. For mental and emotional distress;
7. For disfigurement;
8. For loss of enjoyment of life;
9. For exemplary damages;
10. For pre-judgment interest, attorney fees and costs; and

1 11. For such other and further relief as the Court may deem just and
2 proper.
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6 **VI. JURY DEMAND**

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8 A jury trial is hereby requested.
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11 DATED this _____ day of _____, 2020.
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13 GOREY LAW GROUP, P.C.

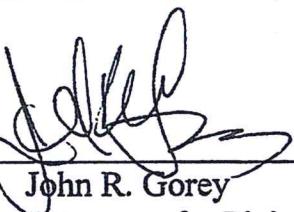
14 FELTMAN EWING, P.S.

15 By: _____
16 John R. Gorey
17 Attorneys for Plaintiff

18 By: _____
19 Richard C. Feltman, WSBA #8320
20 Attorneys for Plaintiff
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DATED this 1st day of December, 2020.

GOREY LAW GROUP, P.C.

By: 

John R. Gorey
Attorneys for Plaintiff

FELTMAN EWING, P.S.

By: 

Richard C. Feltman, WSBA #8320
Attorneys for Plaintiff